

ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD.

APPLIED FOR

FORM 1120-F

ITEM Q

STATEMENT 1

(A) NAME ABERDEEN ENTERPRISES (BVI) LTD.
 ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
 EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
 (LOSS)

(A) NAME BRICKCHURCH ENTERPRISES (BVI) LTD.
 ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
 EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
 (LOSS)

(A) NAME ABERDEEN ENTERPRISES LTD.
 ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
 EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
 (LOSS)

(A) NAME BRICKCHURCH ENTERPRISES LTD.
 ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
 EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
 (LOSS)

ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD.

APPLIED FOR

FORM 1120-F

ITEM V

STATEMENT 2

(A) NAME LOUISE BLOUIN
 ADDRESS 376 GIN LANE, SOUTHAMPTON, NY 11968
 IDENTIFYING NUMBER
 (B) PERCENT OF STOCK 100.00%

FORM 1120-F

OTHER DEDUCTIONS

STATEMENT 3

DESCRIPTION

AMOUNT

PROPERTY MAINTENANCE
 REAL ESTATE TAXES

161,058.
 43,383.

TOTAL TO FORM 1120-F, PAGE 3, LINE 27

204,441.

NET OPERATING LOSS DEDUCTION

STATEMENT 4

TAX YEAR	LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
12/31/14	260,486.		260,486.	260,486.
NOL AVAILABLE THIS YEAR			260,486.	260,486.

1612

Form **1120-F**For calendar year 2016, **U.S. Income Tax Return of a Foreign Corporation**
or tax year beginning and ending

OMB No. 1545-0123

2016Department of the Treasury
Internal Revenue ServiceInformation about Form 1120-F and its separate instructions is at www.irs.gov/form1120f.

Type or Print	Name ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD. C/O LOUISE BLOUIN	Employer identification number # APPLIED FOR
	Number, street, and room or suite no. (see instructions) 376 GIN LANE	# 09/07/2017
	City or town, state or province, country, and ZIP or foreign postal code SOUTHAMPTON, NY 11968	Check box(es) if: <input type="checkbox"/> Name or address change <input type="checkbox"/> Initial return <input type="checkbox"/> First post-merger return <input type="checkbox"/> Final return <input checked="" type="checkbox"/> Schedule M-3 attached <input type="checkbox"/> Amended return <input type="checkbox"/> Protective return

A Country of incorporation **BRITISH VIRGIN ISLANDS VI**

B Foreign country under whose laws the income reported on this return is also subject to tax

C Date incorporated **04/28/1998**D (1) Location of corporation's primary books and records (city, province or state, and country) **TORTOLA 15**
BRITISH VIRGIN ISLANDS(2) Principal location of worldwide business
PO BOX 659, ROAD TOWN
TORTOLA BRITISH VIRGIN ISLANDS(3) If the corporation maintains an office or place of business in the U.S., check here ☒ X

E If the corporation had an agent in the United States at any time during the tax year, enter:

(1) Type of agent

(2) Name

(3) Address

F See the instructions and enter the corporation's principal:

(1) Business activity code number **531390**(2) Business activity **INVESTMENT HOLDING COMP**(3) Product or service **REAL ESTATE**G Check method of accounting: (1) ☒ Cash (2) ☐ Accrual(3) ☐ Other (specify)

Computation of Tax Due or Overpayment

1	Tax from Section I, line 11, page 3	1	0.
2	Tax from Section II, Schedule J, line 9, page 5	2	0.
3	Tax from Section III (add lines 6 and 10 on page 6)	3	0.
4	Total tax. Add lines 1 through 3	4	0.
5a	2015 overpayment credited to 2016	5a	
b	2016 estimated tax payments	5b	
c	Less 2016 refund applied for on Form 4466	5c	
d	Combine lines 5a through 5c	5d	
e	Tax deposited with Form 7004	5e	
f	Credit for tax paid on undistributed capital gains (attach Form 2439)	5f	
g	Credit for federal tax paid on fuels (attach Form 4136). See instructions	5g	
h	Refundable credit from Form 8827, line 8c	5h	
i	U.S. income tax paid or withheld at source (add line 12, page 3, and amounts from Forms 8288-A and 8805 (attach Forms 8288-A and 8805))	5i	
j	Total payments. Add lines 5d through 5i	5j	
6	Estimated tax penalty (see instructions). Check if Form 2220 is attached <input type="checkbox"/>	6	
7	Amount owed. If line 5j is smaller than the total of lines 4 and 6, enter amount owed	7	0.
8a	Overpayment. If line 5j is larger than the total of lines 4 and 6, enter amount overpaid	8a	
b	Amount of overpayment on line 8a resulting from tax deducted and withheld under Chapters 3 and 4 (from Schedule W, line 7, page 8)	8b	
9	Enter portion of line 8a you want Credited to 2017 estimated tax <input type="checkbox"/> Refunded <input type="checkbox"/>	9	

Sign Here	Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.	May the IRS discuss this return with the preparer shown below (see instructions)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Signature of officer <i>[Signature]</i> Date 09/15/2017 Title PRESIDENT	
Paid Preparer Use Only	Print/Type preparer's name BRUCE BALSAM (ELLIOT HOROWITZ & COMPANY, LLP)	Preparer's signature <i>[Signature]</i> Date 09/15/2017
	Firm's name ELLIOT HOROWITZ & COMPANY, LLP	Check if self-employed <input type="checkbox"/> Firm's EIN PTIN
	Firm's address 675 THIRD AVENUE NEW YORK, NY 10017	Phone no. 212-972-7500

For Paperwork Reduction Act Notice, see separate instructions.

Form **1120-F** (2016)

20594382

Form **5472**

(Rev. December 2012)

Department of the Treasury
Internal Revenue Service**Information Return of a 25% Foreign-Owned U.S. Corporation
or a Foreign Corporation Engaged in a U.S. Trade or Business**

(Under Sections 6038A and 6038C of the Internal Revenue Code)

► Information about Form 5472 and its separate instructions is at www.irs.gov/form5472.For tax year of the reporting corporation beginning JAN 1, 2016 and ending DEC 31, 2016

Note. Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0805

Part I Reporting Corporation (see instructions.) All reporting corporations must complete Part I.					
1a Name of reporting corporation ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD C/O LOUISE BLOUIN				1b Employer identification number APPLIED FOR	
Number, street, and room or suite no. (if a P.O. box, see instructions) 376 GIN LANE				1c Total assets \$ 20,594,382.	
City or town, state, ZIP code (if a foreign address, see instructions) SOUTHAMPTON NY 11968					
1d Principal business activity ► REAL ESTATE			1e Principal business activity code ► 531390		
1f Total value of gross payments made or received (see instructions) reported on this Form 5472 \$ 9,304,540.		1g Total number of Forms 5472 filed for the tax year 1		1h Total value of gross payments made or received (see instructions) reported on all Forms 5472 \$ 9,304,540.	
1i Check here if this is a consolidated filing of Form 5472 ► <input type="checkbox"/>	1j Country of incorporation BVI	1k Country(ies) under whose laws the reporting corporation files an income tax return as a resident BRITISH VIRGIN ISLANDS		1l Principal country(ies) where business is conducted UNITED STATES	
2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation <input type="checkbox"/>					
Part II 25% Foreign Shareholder (see instructions.)					
1a Name and address of direct 25% foreign shareholder LOUISE BLOUIN HAUS BLAUHERD WIESTISTRAS ZERMATT 3920 SWEDEN				1b(1) U.S. identifying number, if any [REDACTED]	
				1b(2) Reference ID number (see instructions) 1	
1c Principal country(ies) where business is conducted UNITED STATES	1d Country of citizenship, organization, or incorporation CANADA	1e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident SWITZERLAND			
2a Name and address of direct 25% foreign shareholder				2b(1) U.S. identifying number, if any	
				2b(2) Reference ID number (see instructions)	
2c Principal country(ies) where business is conducted	2d Country of citizenship, organization, or incorporation	2e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident			
3a Name and address of ultimate indirect 25% foreign shareholder				3b(1) U.S. identifying number, if any	
				3b(2) Reference ID number (see instructions)	
3c Principal country(ies) where business is conducted	3d Country of citizenship, organization, or incorporation	3e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident			
4a Name and address of ultimate indirect 25% foreign shareholder				4b(1) U.S. identifying number, if any	
				4b(2) Reference ID number (see instructions)	
4c Principal country(ies) where business is conducted	4d Country of citizenship, organization, or incorporation	4e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident			

ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD.

APPLIED FOR

Form 5472 (Rev. 12-2012)

Page 2

Part III Related Party (see instructions)Check applicable box: Is the related party a ☒ foreign person or ☐ U.S. person? All reporting corporations must complete this question and the rest of Part III.

1a Name and address of related party LOUISE BLOUIN HAUS BLAUHERD WIESTISTRASSE 61 ZERMATT 3920 SWEDEN		1b(1) U.S. identifying number, if any [REDACTED]
		1b(2) Reference ID number (see instructions) 1
1c Principal business activity ► REAL ESTATE		1d Principal business activity code ► 551112
1e Relationship-Check boxes that apply: <input type="checkbox"/> Related to reporting corporation <input type="checkbox"/> Related to 25% foreign shareholder <input checked="" type="checkbox"/> 25% foreign shareholder		
1f Principal country(ies) where business is conducted BRITISH VIRGIN ISLANDS		1g Country(ies) under whose laws the related party files an income tax return as a resident BRITISH VIRGIN ISLANDS

Part IV Monetary Transactions Between Reporting Corporations and Foreign Related Party (see instructions)**Caution:** Part IV must be completed if the "foreign person" box is checked in the heading for Part III.If estimates are used, check here ☐

1 Sales of stock in trade (inventory)	1	
2 Sales of tangible property other than stock in trade	2	
3 Platform contribution transaction payments received	3	
4 Cost sharing transaction payments received	4	
5a Rents received (for other than intangible property rights)	5a	
b Royalties received (for other than intangible property rights)	5b	
6 Sales, leases, licenses, etc., of intangible property rights (e.g., patents, trademarks, secret formulas)	6	
7 Consideration received for technical, managerial, engineering, construction, scientific, or like services	7	
8 Commissions received	8	
9 Amounts borrowed a Beginning balance b Ending balance or monthly average ►	9b	
10 Interest received	10	
11 Premiums received for insurance or reinsurance	11	
12 Other amounts received (see instructions)	12	
13 Total. Combine amounts on lines 1 through 12	13	0.
14 Purchases of stock in trade (inventory)	14	
15 Purchases of tangible property other than stock in trade	15	
16 Platform contribution transaction payments paid	16	
17 Cost sharing transaction payments paid	17	
18a Rents paid (for other than intangible property rights)	18a	
b Royalties paid (for other than intangible property rights)	18b	
19 Purchases, leases, licenses, etc., of intangible property rights (e.g., patents, trademarks, secret formulas)	19	
20 Consideration paid for technical, managerial, engineering, construction, scientific, or like services	20	
21 Commissions paid	21	
22 Amounts loaned a Beginning balance 8,622,886. b Ending balance or monthly average ►	22b	9,304,540.
23 Interest paid	23	
24 Premiums paid for insurance or reinsurance	24	
25 Other amounts paid (see instructions)	25	
26 Total. Combine amounts on lines 14 through 25	26	9,304,540.

Part V Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)Describe these transactions on an attached separate sheet and check here. ☐**Part VI Additional Information**

All reporting corporations must complete Part VI.

1 Does the reporting corporation import goods from a foreign related party?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
2a If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If "No," do not complete b and c below.		
b If "Yes," attach a statement explaining the reason or reasons for such difference.		
c If the answers to questions 1 and 2a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
4 During the course of the tax year, did the foreign parent corporation become a participant in any cost sharing arrangement?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD.

FORM 1120-F

ITEM Q

STATEMENT 1

(A) NAME ABERDEEN ENTERPRISES (BVI) LTD.
ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
(LOSS)

(A) NAME BRICKCHURCH ENTERPRISES (BVI) LTD.
ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
(LOSS)

(A) NAME ABERDEEN ENTERPRISES LTD.
ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

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(LOSS)

(A) NAME BRICKCHURCH ENTERPRISES LTD.
ADDRESS PO BOX 659, ROAD TOWN, TORTOLA, BRITISH VIRGIN ISLANDS
EIN [REDACTED]

(B) PERCENT OF STOCK 100.00%

(C) TAXABLE INCOME
(LOSS)

ABERDEEN ENTERPRISES HOLDINGS (BVI) LTD.

FORM 1120-F ITEM V STATEMENT 2

(A) NAME LOUISE BLOUIN
 ADDRESS 376 GIN LANE, SOUTHAMPTON, NY 11968
 IDENTIFYING NUMBER
 (B) PERCENT OF STOCK 100.00%

FORM 1120-F OTHER DEDUCTIONS STATEMENT 3

DESCRIPTION	AMOUNT
PROPERTY MAINTENANCE	178,058.
REAL ESTATE TAXES	56,403.
TOTAL TO FORM 1120-F, PAGE 4, LINE 27	234,461.

NET OPERATING LOSS DEDUCTION STATEMENT 4

TAX YEAR	LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
12/31/14	260,486.		260,486.	260,486.
12/31/15	448,810.		448,810.	448,810.
NOL AVAILABLE THIS YEAR			709,296.	709,296.

Bruce Balsam

From: Mathew Kabatoff <mkabatoff@ltbholding.com>
Sent: Monday, September 11, 2017 2:24 PM
To: Bruce Balsam
Subject: RE: Answers to questions

646-401-2099

Bruce,

This is only a cursory response with input from Louise:

- With regard to the cash that was used to pay the mortgage and expenses for 165 Charles Street, should it be a capital contribution or a loan to Aberdeen? If a loan is it from Louise?

What is better for the taxes it can be a loan I always prefer loans

What country is Louise a resident of and citizen of?

Resident: Switzerland
Citizen: Canada

- What was the mortgage balance at the end of the year for 2013, 2014, 2015 and 2016?

The mortgage is an interest only loan

Please note we are not taking a deduction for depreciation as it is an investment property not held out for rental. It was held out for rent and we advertised but we were told not to file we should include 50 000 of rental

Can you please rephrase? Are you stating that you are including or not including the rental portion?

From: Bruce Balsam [mailto:bbalsam@elliethorowitz.com]
Sent: Monday, September 11, 2017 14:12
To: Mathew Kabatoff <mkabatoff@ltbholding.com>
Subject: Answers to questions

Dear Mathew:

Can you give me an update on the answers we are waiting for?

Looking forward to hearing from you,

Bruce

Bruce Balsam, CPA
Partner

Bruce Balsam

From: Mathew Kabatoff <mkabatoff@ltbholding.com>
Sent: Saturday, September 09, 2017 2:18 PM
To: Bruce Balsam
Subject: RE: Questions for Aberdeen Enterprises Holdings (BVI) Ltd.
Attachments: 09092017133828.pdf, Doc # 8.pdf

Bruce,

I will be sending these responses questions shortly. However, I have been able to locate a document pertaining to the original closing of 165. Hopefully it provides enough information for the return calculation.

The purchase price is listed as 20MM, although the other document, already sent, listed 20.605MM.

Best,
MK

From: Bruce Balsam [mailto:bbalsam@elliothorowitz.com]
Sent: Friday, September 8, 2017 11:16
To: Mathew Kabatoff <mkabatoff@ltbholding.com>
Subject: FW: Questions for Aberdeen Enterprises Holdings (BVI) Ltd.

Hi Mathew:

Below are some questions, highlighted below, that have come up as we work on the tax returns.

Looking forward to your responses,

Bruce

Bruce Balsam, CPA
Partner
Elliot Horowitz & Company, LLP
675 Third Ave. 23FL
New York, NY 10017
212-972-7500 Ext 106
212-972-7050 FAX
bbalsam@elliothorowitz.com
www.elliothorowitz.com

From: Jennifer Donato
Sent: Friday, September 08, 2017 10:47 AM
To: Bruce Balsam <bbalsam@elliothorowitz.com>
Subject: Questions for Aberdeen Enterprises Holdings (BVI) Ltd.

Hi Bruce – Below please find some questions regarding the 2014 tax return for the above client:

- With regard to the cash that was used to pay the mortgage and expenses for 165 Charles Street, should it be a capital contribution or a loan to Aberdeen? If a loan is it from Louise?
- What country is Louise a resident of and citizen of?
- What was the mortgage balance at the end of the year for 2013, 2014, 2015 and 2016?
- Please note we are not taking a deduction for depreciation as it is an investment property not held out for rental.

Thank you,

Jen

Jennifer Donato, CPA - Tax Manager
Elliot Horowitz & Company LLP
675 Third Avenue, 23rd Floor
New York, NY 10017
T: 212.972.7500 (X 154) F: 212.972.7050

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From: [Mathew Kabatoff](#)
To: [Bruce Balsam](#)
Subject: RE: Answers to questions
Date: Monday, September 11, 2017 2:23:59 PM

Bruce,

This is only a cursory response with input from Louise:

- With regard to the cash that was used to pay the mortgage and expenses for 165 Charles Street, should it be a capital contribution or a loan to Aberdeen? If a loan is it from Louise?

What is better for the taxes it can be a loan I always prefer loans

What country is Louise a resident of and citizen of?

Resident: Switzerland

Citizen: Canada

- What was the mortgage balance at the end of the year for 2013,2014, 2015 and 2016?

The mortgage is an interest only loan

Please note we are not taking a deduction for deprecation as it is an investment property not held out for rental. It was held out for rent and we advertised but we were told not to file we should include 50 000 of rental

Can you please rephrase? Are you stating that you are including or not including the rental portion?

From: Bruce Balsam [mailto:bbalsam@elliothorowitz.com]
Sent: Monday, September 11, 2017 14:12
To: Mathew Kabatoff <mkabatoff@ltbholding.com>
Subject: Answers to questions

Dear Mathew:

Can you give me an update on the answers we are waiting for?

Looking forward to hearing from you,

Bruce

Bruce Balsam, CPA
Partner
Elliot Horowitz & Company, LLP
675 Third Ave. 23FL
New York, NY 10017
212-972-7500 Ext 106
212-972-7050 FAX
bbalsam@elliothorowitz.com

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For more information please visit <http://www.symanteccloud.com>

From: [Mathew Kabatoff](#)
To: [Bruce Balsam](#); [Elliot Horowitz](#)
Cc: [Louise Blouin](#)
Subject: RE: 165 Charles Street - Document Request for Tax return preparation
Date: Tuesday, September 5, 2017 3:47:47 PM
Attachments: [165 LLC Updated Financial Statements V1.xls](#)
[Required Documents.xls](#)
[Doc # 1.pdf](#)
[Doc # 2.pdf](#)
[Doc # 3.pdf](#)
[Doc # 4.pdf](#)
[Doc # 5.pdf](#)
[Doc # 6.pdf](#)
[Doc # 7.pdf](#)
[Doc # 8.pdf](#)

Dear Bruce,

Please find the documentation for the 165 closing attached. Can you let me know what further information you require, along with your projected closing date. As of most recent communication with the Buyers, they are intent on maintaining the closing date of September 14 – although we have requested the 19 or 20.

Regarding the withholding taxes, what steps do we need to take so that the Buyer places these funds in escrow, while we wait for exemption approval?

As per the call with David, our intent is to show zero capital gains, using the last three years to file returns for exemptions, and to apply for the withholding exemption. David indicated that the branch profit tax would not apply since there are no gains. Please contact David if further information is required.

Best regards,
Mathew Kabatoff

From: Bruce Balsam [<mailto:bbalsam@elliothorowitz.com>]
Sent: Wednesday, August 30, 2017 09:57
To: Mathew Kabatoff <mkabatoff@ltbholding.com>; Elliot Horowitz <ehorowitz@elliothorowitz.com>
Cc: Louise Blouin <ltb@ltbholding.com>; Hryck, David M. <DHryck@ReedSmith.com>
Subject: RE: 165 Charles Street - Document Request for Tax return preparation

Attached please find the document request.

Please call me with any questions.

Sincerely,

Bruce

Bruce Balsam, CPA
Partner
Elliot Horowitz & Company, LLP

675 Third Ave. 23FL
New York, NY 10017
212-972-7500 Ext 106
212-972-7050 FAX
bbalsam@elliothorowitz.com
www.elliothorowitz.com

From: Mathew Kabatoff [<mailto:mkabatoff@ltbholding.com>]
Sent: Tuesday, August 29, 2017 3:37 PM
To: Bruce Balsam <bbalsam@elliothorowitz.com>; Elliot Horowitz <ehorowitz@elliothorowitz.com>
Cc: Louise Blouin <ltb@ltbholding.com>
Subject: RE: 165 Charles Street - Letter of Engagement

Dear Bruce,

For the practical purposes of this engagement letter you can use our Southampton address – although Louise is a Swiss resident. I will let you know if this requires amendment.

Name: Louise Blouin
Address: 376 Gin Lane Southampton, NY, 11968
Tel: 6464012099

Best,
MK

From: Bruce Balsam [<mailto:bbalsam@elliothorowitz.com>]
Sent: Tuesday, August 29, 2017 11:46
To: Mathew Kabatoff <mkabatoff@ltbholding.com>; Elliot Horowitz <ehorowitz@elliothorowitz.com>
Cc: Louise Blouin <ltb@ltbholding.com>
Subject: RE: 165 Charles Street - Letter of Engagement

Dear Mathew:

Please send me the contact information for the engagement letter:

Name
Address
Telephone number

Thanks,

Bruce

Bruce Balsam, CPA
Partner
Elliot Horowitz & Company, LLP
675 Third Ave. 23FL
New York, NY 10017
212-972-7500 Ext 106
212-972-7050 FAX
bbalsam@elliothorowitz.com
www.elliothorowitz.com

From: Mathew Kabatoff [<mailto:mkabatoff@ltbholding.com>]
Sent: Tuesday, August 29, 2017 8:50 AM
To: Elliot Horowitz <ehorowitz@elliothorowitz.com>
Cc: Bruce Balsam <bbalsam@elliothorowitz.com>; Louise Blouin <ltb@ltbholding.com>
Subject: 165 Charles Street - Letter of Engagement

Dear Eliot,

Thanks for the call yesterday afternoon. Can you please send us a letter of engagement today for the 165 Charles Street transaction. As mentioned, we have a somewhat tight deadline, where we need to conclude the sale prior to September 14. We will work on our end to prepare all financials, and keep David involved to advise on requirements for withholding and branch taxes.

Best regards,
Mathew Kabatoff

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December 4, 2017

By UPS

Internal Revenue Service Center
Ogden, UT 84201-0023

Re: Filing of Form 8832 Entity Classification Election for Aberdeen Enterprises Holdings (BVI) Ltd
(EIN #)

To Whom it May Concern,

Please find attached an executed Form 8832 Entity Classification Election on behalf of the above referenced taxpayer. Please note that the taxpayer is making an initial classification election to be treated as a foreign eligible entity with a single owner electing to be disregarded as a separate entity.

Should you have any questions, please feel free to call the individual listed on Line 9 of Form 8832 attached. Thank you.

Very truly yours,


David M. Hryck

Enclosure

Form **8832**

(Rev. December 2013)

Entity Classification Election

OMB No. 1545-1518

Department of the Treasury
Internal Revenue Service► Information about Form 8832 and its instructions is at www.irs.gov/form8832.

Type or Print	Name of eligible entity making election	Employer identification number
	Aberdeen Enterprises Holdings (BVI) Ltd	
	Number, street, and room or suite no. If a P.O. box, see instructions.	
	376 GIN LANE	
	City or town, state, and ZIP code. If a foreign address, enter city, province or state, postal code and country. Follow the country's practice for entering the postal code.	
	SOUTHAMPTON, NY 11968	

- Check if: ☐ Address change ☐ Late classification relief sought under Revenue Procedure 2009-41
☐ Relief for a late change of entity classification election sought under Revenue Procedure 2010-32

Part I Election Information**1 Type of election (see instructions):**

- a ☒ Initial classification by a newly-formed entity. Skip lines 2a and 2b and go to line 3.
b ☐ Change in current classification. Go to line 2a.

2a Has the eligible entity previously filed an entity election that had an effective date within the last 60 months?

- ☐ Yes. Go to line 2b.
☐ No. Skip line 2b and go to line 3.

2b Was the eligible entity's prior election an initial classification election by a newly formed entity that was effective on the date of formation?

- ☐ Yes. Go to line 3.
☐ No. Stop here. You generally are not currently eligible to make the election (see instructions).

3 Does the eligible entity have more than one owner?

- ☐ Yes. You can elect to be classified as a partnership or an association taxable as a corporation. Skip line 4 and go to line 6.
☒ No. You can elect to be classified as an association taxable as a corporation or to be disregarded as a separate entity. Go to line 4.

4 If the eligible entity has only one owner, provide the following information:

- a Name of owner ► Louise T. Blouin
b Identifying number of owner ► None

5 If the eligible entity is owned by one or more affiliated corporations that file a consolidated return, provide the name and employer identification number of the parent corporation:

- a Name of parent corporation ►
b Employer identification number ►

Part I Election Information (Continued)

6 Type of entity (see instructions):

- a ☐ A domestic eligible entity electing to be classified as an association taxable as a corporation.
b ☐ A domestic eligible entity electing to be classified as a partnership.
c ☐ A domestic eligible entity with a single owner electing to be disregarded as a separate entity.
d ☐ A foreign eligible entity electing to be classified as an association taxable as a corporation.
e ☐ A foreign eligible entity electing to be classified as a partnership.
f ☒ A foreign eligible entity with a single owner electing to be disregarded as a separate entity.

7 If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization ► British Virgin Islands

8 Election is to be effective beginning (month, day, year) (see instructions) 11/02/2017

9 Name and title of contact person whom the IRS may call for more information

10 Contact person's telephone number

David M. Hryck

212-548-0370

Consent Statement and Signature(s) (see instructions)

Under penalties of perjury, I (we) declare that I (we) consent to the election of the above-named entity to be classified as indicated above, and that I (we) have examined this election and consent statement, and to the best of my (our) knowledge and belief, this election and consent statement are true, correct, and complete. If I am an officer, manager, or member signing for the entity, I further declare under penalties of perjury that I am authorized to make the election on its behalf.

[illegible]